

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,

§

*Plaintiffs,*

§

v.

§

GREG ABBOTT, *et al.*,

§

*Defendants.*

§

Case No. 5:21-cv-844-XR  
[Lead case]

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**STATE DEFENDANTS' DESIGNATION OF REBUTTAL EXPERTS**

Pursuant to the Court's Scheduling Order, *see* ECF 125, and subsequent scheduling-order amendments, *see* ECF 161, 214, 307, and Text Order of 03/07/2022, the State Defendants file their designation of rebuttal experts

**DESIGNATION OF TESTIFYING EXPERTS**

1. **Professor Mark Hoekstra.** Professor Hoekstra is the Private Enterprise Research Center Rex B. Grey Associate Professor of Economics at Texas A&M University, a Research Fellow at Institute of Labor Economics, and a Research Associate at the National Bureau of Economic Research. Professor Hoekstra is expected to testify on the impact of SB1 on racial and ethnic minorities, the acceptance and rejection of mail-voting applications and mail ballots, and the conclusions reached in Drs. Hersh, McDaniel, and Grose's expert reports prepared for Plaintiffs.
2. **Professor Stephen Graves.** Professor Graves is the Abraham J. Siegel Professor of Management and a Professor of Operations Management at the Massachusetts Institute of Technology Sloan School of Management. He holds a joint appointment with the MIT Department of Mechanical Engineering. Professor Graves is expected to testify on the impact of SB1 on the time it takes to vote and the conclusions reached in Dr. Mayer's expert report prepared for Plaintiffs.

Also pursuant to the Court's Scheduling Order, the State Defendants will serve on all parties, but not file, the materials required by Federal Rule of Civil Procedure 26(a)(2)(B).

Date: March 29, 2022

KEN PAXTON  
Attorney General of Texas

BRENT WEBSTER  
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Respectfully submitted.

*/s/ Patrick K. Sweeten*  
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**COUNSEL FOR STATE DEFENDANTS**

**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on March 29, 2022, and that all counsel of record were served by CM/ECF.

*/s/ Patrick K. Sweeten*  
PATRICK K. SWEETEN